



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

FERES JERIES RABADI,

Defendant.

CR 2:22-cr-00507 -FWS

I N D I C T M E N T

[26 U.S.C. § 7206(1): Subscribing
to a False Tax Return]

The Grand Jury charges:

COUNT ONE

[26 U.S.C. § 7206(1)]

On or about August 18, 2016, in Los Angeles County, within the Central District of California, defendant FARES JERIES RABADI willfully made and subscribed to a materially false United States Individual Income Tax Return, Form 1040, for the calendar year 2015, which defendant RABADI verified by written declaration that it was made under the penalties of perjury, and caused that tax return to be filed with the Internal Revenue Service, knowing it to contain false information as to a material matter. Specifically, defendant RABADI falsely claimed on line 22 that his total income for that year was

1 \$90,199, when, in fact, as defendant RABADI then knew, his total
2 income was substantially higher than that amount.

COUNT TWO

[26 U.S.C. § 7206(1)]

On or about August 29, 2017, in Los Angeles County, within the Central District of California, defendant FARES JERIES RABADI willfully made and subscribed to a materially false United States Individual Income Tax Return, Form 1040, for the calendar year 2016, which defendant RABADI verified by written declaration that it was made under the penalties of perjury, and caused that tax return to be filed with the Internal Revenue Service, knowing it to contain false information as to a material matter. Specifically, defendant RABADI falsely claimed on line 22 that his total income for that year was \$78,977, when, in fact, as defendant RABADI then knew, his total income was substantially higher than that amount.

COUNT THREE

[26 U.S.C. § 7206(1)]

On or about October 11, 2018, in Los Angeles County, within the Central District of California, defendant FARES JERIES RABADI willfully made and subscribed to a materially false United States Individual Income Tax Return, Form 1040, for the calendar year 2017, which defendant RABADI verified by written declaration that it was made under the penalties of perjury, and caused that tax return to be filed with the Internal Revenue Service, knowing it to contain false information as to a material matter. Specifically, defendant RABADI falsely claimed on line 22 that his total income for that year was \$38,810, when, in fact, as defendant RABADI then knew, his total income was substantially higher than that amount.

COUNT FOUR

[26 U.S.C. § 7206(1)]

On or about October 29, 2019, in Los Angeles County, within the Central District of California, defendant FARES JERIES RABADI willfully made and subscribed to a materially false United States Individual Income Tax Return, Form 1040, for the calendar year 2018, which defendant RABADI verified by written declaration that it was made under the penalties of perjury, and caused that tax return to be filed with the Internal Revenue Service, knowing it to contain false information as to a material matter. Specifically, defendant RABADI falsely claimed on line 6 that his total income for that year was

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1 \$42,999, when, in fact, as defendant RABADI then knew, his total
2 income was substantially higher than that amount.

3 A TRUE BILL

4
5 /s/
6 _____
Foreperson

7 E. MARTIN ESTRADA
8 United States Attorney

9 

10 SCOTT M. GARRINGER
11 Assistant United States Attorney
Chief, Criminal Division

12 SHAWN J. NELSON
13 Assistant United States Attorney
14 Chief, International Narcotics,
Money Laundering, and
Racketeering Section

15 BRITTNEY M. HARRIS
16 Assistant United States Attorney
17 Deputy Chief, International
Narcotics, Money Laundering, and
Racketeering Section